

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ROBERTO VLADIMIR PORTILLO MARTINEZ, )

Petitioner, )

v. )

PATRICIA HYDE, Field Office Director, )  
TODD LYONS, Acting Director U.S. )  
Immigrations and Customs Enforcement, )  
KRISTI NOEM, U.S. Secretary )  
of Homeland Security, PAMELA BONDI, )  
Attorney General of the United States, and )  
and ANTONE MONIZ, Superintendent, )  
Plymouth County Correctional Facility, )

Respondents. )

Case No. 1:25-cv-11909

**PETITIONER'S MOTION FOR  
LEAVE TO FILE REPLY**

**PETITIONER'S ASSENTED-TO MOTION  
FOR LEAVE TO FILE REPLY TO  
RESPONDENTS' OPPOSITION TO PETITIONER'S SECOND AMENDED PETITION  
FOR WRIT OF HABEAS**

Pursuant to Local R. 7.1(b)(3), Petitioner respectfully moves for leave to file the attached Reply to Respondents' Response and Opposition (ECF Doc. 28) to Petitioner's the Second Amended Habeas Petition in order to adequately address the arguments presented by Respondents as well as recent jurisprudence of this Court. Counsel for Respondents has assented to the instant motion. The proposed reply is attached. *See* Exhibit A.

Respectfully submitted,  
Roberto Vladimir Portillo Martinez,  
By his attorney,

Dated: October 21, 2025

/s/ Elizabeth Badger

Elizabeth Badger  
BBO # 663107

Political Asylum/Immigration  
Representation (PAIR) Project  
98 North Washington St, Ste. 106  
Boston, MA 02114  
(617) 545-3373  
ebadger@pairproject.org

**CERTIFICATE OF SERVICE**

I, Elizabeth Badger, hereby certify that this document and exhibits filed through the ECF system will be sent electronically to the Respondents who are registered ECF participants as identified on the Notice of Electronic Filing (NEF).

Dated: October 21, 2025

/s/ Elizabeth Badger  
Elizabeth Badger  
BBO # 663107